AO 257 (Rev. 6/78)	I DEL ATIVE TO	A COMMINAL ACTION IN HE DISTRICT COURT
		A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION	☑ INDICTMENT ☐	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED	SUPERSEDING	NORTHERN DISTRICT OF CALIFORNIA
See attached	Petty	OAKLAND DIVISION
	Minor	C DEFENDANT - U.S
	Misde-	4
*	L_J meanor	DANIEL JAMES
PENALTY: See attached		DISTRICT COURT NUMBER
PENALTY: See attached		ED CR 19 040
	FI	- C - C - C - C - C - C - C - C - C - C
		DEFENDANT
PROCEEDING _	JAL	IS NOT IN CUSTODY SOON Has not been arrested, pending outcome this proceeding. U.S. DISTRICT OF CALLE confiderationed give date any prior Summons was served on above charges
Name of Complaintant Agency, or Person (&	Title, if any) SUS	ANY SOUNT as not been arrested, pending outcome this proceeding.
ATF	CLERK. NORTHERN	DISTRICT OF CALIFORNIA summons was served on above charges
person is awaiting trial in another Federa		2) 🦳 Is a Fugitive
☐ give name of court		
	-	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from	m another district	
per (circle one) FRCrp 20, 21, or 40. Sh		IS IN CUSTODY
		4) 🔀 On this charge
this is a reprosecution of		, , , , , , , , , , , , , , , , , , ,
charges previously dismissed which were dismissed on motion	SHOW	5) On another conviction
of:	DOCKET NO.	6) Awaiting trial on other charges
U.S. ATTORNEY DEFENSE	}	If answer to (6) is "Yes", show name of institution
	J	
this prosecution relates to a pending case involving this same		Has detainer Yes If "Yes" give date
defendant	MAGISTRATE CASE NO.	been filed? No silve date filed
prior proceedings or appearance(s)	CASE NO.	DATE OF Month/Day/Year
before U.S. Magistrate regarding this defendant were recorded under	J 4-19-70012 MAG	ARREST 7
		Or if Arresting Agency & Warrant were not DATE TRANSFERRED Month/Day/Year
Name and Office of Person Furnishing Information on this form Da	avid Anderson	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
☑ U.S. Atforney ☐	Other U.S. Agency	
Name of Assistant U.S.		This report amends AO 257 previously submitted
, titornoj (ii decigned)	& Frank Riebli	
PROCESS:	ADDITIONAL INFO	RMATION OR COMMENTS
SUMMONS NO PROCESS*	☐ WARRANT F	Bail Amount:
If Summons, complete following:		-
Arraignment Initial Appearance		Where defendant previously apprehended on complaint, no new summons or varrant needed, since Magistrate has scheduled arraignment
Defendant Address:		
		Date/Time: Before Judge:
Comments:		

PENALTY SHEET - DANIEL JAMES

Count One:

18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States

Maximum Penalties: 5 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Three: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in firearms without a license

Maximum Penalties: 5 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Count Nine:

18 U.S.C. § 922(o) – Possession of a Machine Gun

Maximum Penalties: 10 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Count Ten:

18 U.S.C. § 922(k) – Possession of a Firearm with an Obliterated Serial Number

Maximum Penalties: 5 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Counts Fifteen, Eighteen: 21 U.S.C. § 841(a)(1) and (b)(1)(B) – Distribution and Possession with Intent to Distribute 28 grams or more of Cocaine Base

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

Counts Sixteen, Nineteen, Twenty, Twenty-One: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine or Cocaine Base

Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

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DEFENDANT INFORMATION RELATIVE	TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMEN	NT Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSED	NORTHERN DISTRICT OF CALIFORNIA
21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) –	OAKLAND DIVISION
Conspiracy to Distribute and Possess with Intent to	nor DEFENDANT - U.S
5538	sde-
	eanor GEORGE MOORE JR.
PENALTY: See attached	DISTRICT COURT NUMBER
FILE	CR 19 043
MAL	2th Control YGR
PROCEEDING SUSA OLERK OLERK OLERK ATF	NY SOONG DEFENDANT
Name of Complaintant Agency or Person (8 Title if and IRM)	Has not been arrested, pending outcome this proceeding.
Name of Complaintant Agency, of Person (& Title, II) ANNIL.	1) If not detained give date any prior summons was served on above charges
person is awaiting trial in another Federal or State Court,	2) S a Fugitive
	3) 🔀 Is on Bail or Release from (show District)
this newson/arrangeding is transferred from another district	Northern District of California
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	
	IS IN CUSTODY 4) On this charge
this is a reprosecution of	The first and sharge
charges previously dismissed which were dismissed on motion SHOW	5) On another conviction
of: DOCKET N	O. 6) Awaiting trial on other charges
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes 1 If "Yes"
	Has detainer Li dive date
prior proceedings or appearance(s)	
before U.S. Magistrate regarding this defendant were recorded under	G ARREST 7
2	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form David Anderson	DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year
☑ U.S. Attorney ☐ Other U.S. Agend	y
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Riebli	This report amends AO 257 previously submitted
PROCESS: ADDITIONAL IN	FORMATION OR COMMENTS
SUMMONS NO PROCESS* WARRANT	Bail Amount:
If Summons, complete following:	* Where defendant previously apprehended on complaint, no new summons or
Arraignment Initial Appearance Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Commentar	
Comments:	

PENALTY SHEET - GEORGE MOORE JR.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Fourteen: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

7.10 207 (1.104. 0770)		
DEFENDANT INFORMATION	RELATIVE TO A	CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION		Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED ———	SUPERSEDING	NORTHERN DISTRICT OF CALIFORNIA
21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) –	Petty	OAKLAND DIVISION
Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine; 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and	Minor	DEFENDANT - U.S
Possession with Intent to Distribute Cocaine Base	Misde- meanor	TERRY WALKER SR.
PENALTY: See attached	▼ Felony	C RDISTRICT OF WITH NUMBER 43 YGR
	FIL	DEFENDANT
PROCEEDING _		0040
# # # # # # # # # # # # # # # # # # #	Title, if any) SUSAN	Has not been arrested pending outcome this proceeding
person is awaiting trial in another Federa give name of court	al or State Count, THERN DIS	1 Y SOUTH If not detained give date any prior STRICT OF CALLE COMMENT ON STRICT
	O	3) 🔀 Is on Bail or Release from (show District)
this person/proceeding is transferred from per (circle one) FRCrp 20, 21, or 40. Sh		Northern District of California IS IN CUSTODY
this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE this prosecution relates to a pending case involving this same	SHOW DOCKET NO.	4) On this charge 5) On another conviction Federal State 6) Awaiting trial on other charges If answer to (6) is "Yes", show name of institution Has detainer Yes
defendant	MAGISTRATE CASE NO.	been filed? No Nonth/Day/Year
prior proceedings or appearance(s) before U.S. Magistrate regarding this	4-19-70013 MAG	ARREST
defendant were recorded under		Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form Dav	vid Anderson	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
☑ U.S. Attorney ☐	Other U.S. Agency	
Name of Assistant U.S. Attorney (if assigned) Shiao Lee 8	& Frank Riebli	This report amends AO 257 previously submitted
PROCESS:	DDITIONAL INFORM	IATION OR COMMENTS
☐ SUMMONS ☒ NO PROCESS* If Summons, complete following:	☐ WARRANT Bail	Amount:
Arraignment Initial Appearance Defendant Address:		nere defendant previously apprehended on complaint, no new summons or ant needed, since Magistrate has scheduled arraignment
4	Date	e/Time: Before Judge:
Commonts		
Comments:		

PENALTY SHEET - TERRY WALKER SR.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Twenty-Two: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base

Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

AO 257 (Rev. 6/78)	
DEFENDANT INFORMATION RELATIVE T	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	
21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) – Petty	OAKLAND DIVISION
Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine Mino	
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∟ mear	7 2.1223.113
PENALTY: See attached	DISTRICT COURT NUMBER
	10 19 043 YGR
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	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY Has not been arrested, pending outcome this proceeding.
Name of Complaintant Agency, or Person (& Title, if any)	1) 4 (4) 9) X If not detained give date any prior
I ATC	ACMIT COMMISSION THE CONTROL OF CHANGES A
person is awaiting trial in another Federal or State Count NORTHERN D	S. dISTRICT OF 2) UFOR IS a Fugitive
Alameda County Superior Court	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY 4) On this charge
this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE	5) On another conviction
this prosecution relates to a pending case involving this same defendant MAGISTRATE CASE NO. prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under	Has detainer Yes If "Yes" give date filed DATE OF Month/Day/Year ARREST Or if Arresting Agency & Warrant were not
Name and Office of Person	DATE TRANSFERRED Month/Day/Year
Furnishing Information on this form David Anderson	TO U.S. CUSTODY 7
■ U.S. Attorney ☐ Other U.S. Agency	
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Riebli	This report amends AO 257 previously submitted
ADDITIONAL INFO	ORMATION OR COMMENTS
PROCESS: ☐ SUMMONS ☐ NO PROCESS* ☑ WARRANT	Bail Amount: No bail
If Summons, complete following:	Pair / infodite NO Dall
Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	
*	Date/Time: Before Judge:
Comments:	

PENALTY SHEET - DALE DAVIS

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

DEFENDANT INFORMATION RELATIVE	TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMEN	NT Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSED	NORTHERN DISTRICT OF CALIFORNIA
	OAKLAND DIVISION
Conspiracy to Distribute and Possess with Intent to	nor DEFENDANT - U.S
21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and	sde-
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm 18 U.S.C. § 922(o) – Possession of a Machine Gui	eanor PAUL RIVERA
X Fe	IONY DISTRICT COURT NUMBER
FENALTI. Scentisting	EP CR 19 043
FI	
441	DEFENDANT YGF
PROCEEDING	DEFENDANT SCONG S NOT IN CUSTODY SAN DISTRICT OF FAMILY OF FAMIL
Name of Complaintant Agency, or Person (& Title, if any) $\frac{SU}{CLERK}$	U.S. AISTRICT OF P. If not detained give date any prior
ATF NORTHER	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
— give fialite of court	3) Is on Bail or Release from (show District)
	- Is on Ball of Nelease Holl (show Bistret)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	
per (energe energe ener	IS IN CUSTODY
	4) 🔀 On this charge
this is a reprosecution of charges previously dismissed	5) On another conviction
which were dismissed on motion SHOW of:	O. Federal State
U.S. ATTORNEY DEFENSE	6) Awaiting trial on other charges
<u>J</u>	If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same	Has detainer Yes If "Yes"
defendant MAGISTRAT	TE been filed? No give date
prior proceedings or appearance(s)	DATE OF Month/Day/Year
before U.S. Magistrate regarding this defendant were recorded under	
	Or if Arresting Agency & Warrant were not DATE TRANSFERRED Month/Day/Year
Name and Office of Person Furnishing Information on this form David Anderson	DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year
□ U.S. Attorney □ Other U.S. Agence	у
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Riebli	This report amends AO 257 previously submitted
national (in addignou)	FORMATION OR COMMENTS
PROCESS:	PORIMATION OR COMMENTS
☐ SUMMONS 🔀 NO PROCESS* ☐ WARRANT	Bail Amount:
If Summons, complete following: ☐ Arraignment ☐ Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:

PENALTY SHEET - PAUL RIVERA

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Eleven: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Count Thirteen: 18 U.S.C. § 922(o) – Possession of a Machine Gun

Maximum Penalties: 10 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Count Twenty: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base

Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

DEFENDANT INFORMATION RELATIVE TO	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	
21 U.S.C. § 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) – Petty	OAKLAND DIVISION
Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine; Minor	DEFENDANT - U.S
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;	Viciosis Company de Adrico (Company Company Co
18 U.S.C. § 922(o) – Possession of a Machine Gun mean	or DARRYL WASHINGTON
PENAL® See-attached	DISTRICT COURT NUMBER
PENALD	-ED - 10 0/3
The state of the s	CRIS
NAU	2 4 2019 DEFENDANT
PROCEEDING SUSA	ANY. SOONG NOT IN CUSTODY S. DISTRICT OF CALIFORNIAS not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
Name of Complaintant Agency, or Person (& Title, if any CLERK, UNDETHERN DAMES OF THE NORTHERN DAMES OF THE NORTH DAMES OF THE NORTHERN DAMES OF THE NORTHERN DAMES OF THE NORTH	OF CALIFORNIAS not been arrested, pending outcome this proceeding.
ATF	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) 🔀 On this charge
this is a reprosecution of charges previously dismissed	5) On another conviction
which were dismissed on motion SHOW	Federal State
of: U.S. ATTORNEY DEFENSE	6) Awaiting trial on other charges
G.G. ATTORNEL	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes If "Yes"
pending case involving this same defendant MAGISTRATE	been filed? No give date filed
CASE NO. prior proceedings or appearance(s)	DATE OF Month/Day/Year
before U.S. Magistrate regarding this defendant were recorded under	ARREST 7
	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form David Anderson	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
□ U.S. Attorney □ Other U.S. Agency	
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Riebli	This report amends AO 257 previously submitted
, married (in decignica)	DRMATION OR COMMENTS
PROCESS:	
☐ SUMMONS ☑ NO PROCESS* ☐ WARRANT	Bail Amount:
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	2

PENALTY SHEET - DARRYL WASHINGTON

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 280 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 10 years-life imprisonment, 5 years-lifetime of supervised release, \$10 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

Count Seven: 18 U.S.C. § 922(o) – Possession of a Machine Gun

Maximum Penalties: 10 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Count Eight, Twelve: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm Maximum Penalties: 10 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

710 201 (1107. 0110)	
DEFENDANT INFORMATION RELATIVE	TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTME	NT Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEI	
	oakland division
Distribute and Possess with Intent to Distribute Cocaine	DEFENDANT - U.S
	lisde- neanor CAMERON MOORE-WILLIAMS
PENALTY: See attached	DISTRICT COURT NUMBER
3	FILEDCR 19 043
	.IAN 2 4 2019 DEFENDANT
PROCEEDING Name of Complaintant Agency, or Person (& Title, if any)	SUSAN Y. SOOT IN CUSTODY CLERK, J.S. DISTRICT OF ORLINE tailing of the tail o
ATF	
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
-	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY 4) \(\square \text{On this charge}
this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE	5) On another conviction
this prosecution relates to a pending case involving this same defendant prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under	I I IIIO III III III III III III III II
Name and Office of Person	DATE TRANSFERRED Month/Day/Year
Furnishing Information on this form David Anderson Other U.S. Agent	TO U.S. CUSTODY
	This report amends AO 257 previously submitted
Attorney (if assigned) Shiao Lee & Frank Riebli	
PROCESS: ADDITIONAL IN	NFORMATION OR COMMENTS
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT	Bail Amount: No bail
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	
	Date/Time: Before Judge:
Comments:	

PENALTY SHEET - CAMERON MOORE-WILLIAMS

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

7.0 201 (1.01. 0.7.0)		
DEFENDANT INFORMATION RELA	TIVE TO	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDI	ICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUP	PERSEDING	(a) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c
21 U.S.C. § 846, 841(a)(1) and (b)(1)(B) – Conspiracy to	Petty	OAKLAND DIVISION
Distribute and Possess with Intent to Distribute Cocaine Base and Cocaine;	Minor	
21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base	Misde-	9-
E	☐ meano	V DENTINE REPORTED TO THE PARTY OF THE PARTY
PENALTY: See attached	<u>×</u> Felony ₽	DISTRICT COURT NUMBER
	FIL	EP CR 19 043
		049
PROGESTIMO	MAL	DEFENDANT Y. SONGIS NOT IN CUSTODY Y. SONGIS NOT IN CUSTODY U.S. DISTRICT OF CALL OF not detained give date any prior summons was served on above charges
PROCEEDING Name of Complaintant Agency, or Person (& Title, if ar	ny) cush	AN Y CONGIS NOT IN CUSTODY ON COUNTY ARE NOT IN CUSTODY ON COUNTY ARE NOT IN CUSTODY ON COUNTY ARE NOT IN CUSTODY
ATF	CLERK, U	USI DISTRICT OF CALL AT not detained give date any prior summons was served on above charges
person is awaiting trial in another Federal or State		-
give name of court		
s <u>-1</u>		3) X Is on Bail or Release from (show District)
this person/proceeding is transferred from another		Northern District of California
per (circle one) FRCrp 20, 21, or 40. Show District	t	IS IN CUSTODY
		4) On this charge
this is a reprosecution of charges previously dismissed		5) On another conviction
which were dismissed on motion	SHOW CKET NO.	Federal State
of: U.S. ATTORNEY DEFENSE		6) Awaiting trial on other charges
<u> </u>		If answer to (6) is "Yes", show name of institution
this prosecution relates to a		Has detainer Yes If "Yes"
defendant MAG	SISTRATE	been filed? No No Silve date
prior proceedings or appearance(s)	SE NO.	DATE OF Month/Day/Year
)21 MAG	Or if Arresting Agency & Warrant were not
Name and Office of Person		DATE TRANSFERRED Month/Day/Year
Furnishing Information on this form David Ander	son	TO U.S. CUSTODY
☑ U.S. Attorney ☐ Other U.S.	. Agency	
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Ri	ebli	This report amends AO 257 previously submitted
ADDITION	NAL INFO	DRMATION OR COMMENTS —
PROCESS: ☐ SUMMONS ☐ NO PROCESS* ☐ WARF	τ ΤΙΑς	Bail Amount:
If Summons, complete following:		
Arraignment Initial Appearance		* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:		
		Date/Time: Before Judge:
Comments:		

PENALTY SHEET - DEANTAE KENNEDY PALMER

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

Count Seventeen: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution and Possession with Intent to Distribute Cocaine Base

Maximum Penalties: 20 years imprisonment, 3 years-lifetime of supervised release, \$1 million criminal fine, \$100 special assessment, forfeiture, denial of federal benefits

	*
DEFENDANT INFORMATION RELATIVE TO A	CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDING	NORTHERN DISTRICT OF CALIFORNIA
18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States;	OAKLAND DIVISION
18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License Minor	DEFENDANT - U.S
PENALTY: See attached Misdence meanor X Felony JAN 2 4 2019	DARRELL MURPHY JR. DISTRICT COURT NUMBER CR 19 043
SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	DEFENDANT YGF
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any) ATF	Has not been arrested, pending outcome this proceeding. 1) If not detained give date any prior summons was served on above charges
person is awaiting trial in another Federal or State Court,	2) Is a Fugitive
— give name of court	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE	5) On another conviction Federal State 6) Awaiting trial on other charges If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same defendant MAGISTRATE	Has detainer Yes been filed? No If "Yes" give date filed
prior proceedings or appearance(s) before U.S. Magistrate regarding this	DATE OF Month/Day/Year ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form David Anderson	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
□ U.S. Attorney Other U.S. Agency	
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Riebli	This report amends AO 257 previously submitted
PROCESS: ADDITIONAL INFORM.	ATION OR COMMENTS
	Amount: No bail
If Summons, complete following:	ere defendant previously apprehended on complaint, no new summons or
/ ii algimioni miliai / ippodianoo	nt needed, since Magistrate has scheduled arraignment
Date	/Time: Before Judge:
Comments:	

PENALTY SHEET - DARRELL MURPHY JR.

Count One: 18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States

Maximum Penalties: 5 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Count Six: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in firearms without a license

Maximum Penalties: 5 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Furnishing Information on this form David Anderson TO U.S. CUSTODY		
OFFENSE CHARGED SUPERSEDING SUPERSEDING	DEFENDANT INFORMATION RELATIVE TO	A CRIMINAL ACTION - IN U.S. DISTRICT COURT
OFFENSE OFFENS	BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
Buttle 5 a 371 - Compliany to Commit Offeness Against the Petty	OFFENSE CHARGED SUPERSEDING	NORTHERN DISTRICT OF CALIFORNIA
SULSC. 5 922(a)(1)(A) - Desing freams without a License Million Millio		OAKLAND DIVISION
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DISTRICT COURT NUMBER 19	Distribute and Possess with Intent to Distribute Cocaine and Misde-	STERLING WALKER
PROCEEDING	21 LLS C 6 841(a)(1) and (b)(1)(R) – Distribution and	7
Name of Complaintant Agency, or Person (& Title, if any) 4 2004 ATF	PENALTY: See attached	DISTRICT COURT NUMBER
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Name of Complaintant Agency, or Person (& Title, if any) 4 2 200	Broate Man	DEFENDANT YGR
Name of Complaintant Agency, or Person (a Tide, any) 4 2014 Shi of ATF County Section	PROCEEDING	IS NOT IN CUSTODY
summons was served on above charges person is awaiting trial in another Federal of the Count First COUNT NORTHERN DISTRICT COUNT NORTHERN DISTRICT OF CALFOR NORTHERN DISTRICT OF	Name of Complaintant Agency, or Person (& Title, if any) 1919	
This person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	ATF JAN 24 2010	summons was served on above charges
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per (circle one) FRCrp 20, 21, or 40. Show District		
per (circle one) FRCrp 20, 21, or 40. Show District	this person/proceeding is transferred from another district	
this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE This prosecution relates to a pending case involving this same defendant prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under Name and Office of Person Furnishing Information on this form W.U.S. Attorney Other U.S. Agency Name of Assistant U.S. Attorney Other U.S. Agency Name of Assistant U.S. Attorney Month/Day/Year Month/Day/Ye		IS IN CUSTODY
charges previously dismissed which were dismissed on motion of. ☐ U.S. ATTORNEY ☐ DEFENSE this prosecution relates to a pending case involving this same defendant prior proceedings or appearance(s) ☐ David Anderson Name and Office of Person Furnishing Information on this form ☐ David Anderson ☐ U.S. Attorney ☐ Other U.S. Agency Name of Assistant U.S. Attorney ☐ Other U.S. Agency Name of Assista		
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this prosecution relates to a pending case involving this same defendant MAGISTRATE CASE NO. Prior proceedings or appearance(s) Prior prior proceedings or appearance Prior	J.	6) Awaiting trial on other charges
Acceptable of Person Purple of Assistant U.S. Attorney (if assigned) ADDITIONAL INFORMATION OR COMMENTS Summons, complete following: Arraignment Initial Appearance Defendant Address: Date/Time: Before Judge: Date/Time: Before Judge: Date/Time: Before Judge: Before Judge: Date/Time: Date/Time: Before Judge: Date/Time: Date/	S.O. ATTORNET BEFEROL	If answer to (6) is "Yes", show name of institution
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Name and Office of Person David Anderson David Ande	prior proceedings or appearance(s)	
Name and Office of Person Furnishing Information on this form David Anderson U.S. Attorney Other U.S. Agency		
Furnishing Information on this form David Anderson TO U.S. CUSTODY	Name and Office of Person	
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Riebli ADDITIONAL INFORMATION OR COMMENTS PROCESS: SUMMONS NO PROCESS* WARRANT Bail Amount: If Summons, complete following: Arraignment Initial Appearance Defendant Address: Date/Time: Before Judge:	Furnishing Information on this form David Anderson	TO U.S. CUSTODY
Attorney (if assigned) Shiao Lee & Frank Riebli ADDITIONAL INFORMATION OR COMMENTS PROCESS: SUMMONS NO PROCESS* WARRANT Bail Amount: If Summons, complete following: Arraignment Initial Appearance Defendant Address: Date/Time: Before Judge:		
PROCESS: SUMMONS NO PROCESS* WARRANT Bail Amount: If Summons, complete following: Arraignment Initial Appearance Defendant Address: Date/Time: Bail Amount: * Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment Date/Time: Bail Amount: * Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment Date/Time:		Inis report amends AO 257 previously submitted
SUMMONS NO PROCESS* WARRANT Bail Amount: If Summons, complete following: Arraignment Initial Appearance Defendant Address: * Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment Date/Time: Bail Amount: * Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment Date/Time:	PROCESS: ADDITIONAL INFO	RMATION OR COMMENTS —
If Summons, complete following: Arraignment Initial Appearance Defendant Address: * Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment Date/Time: Before Judge:	Y .	Bail Amount:
Defendant Address: Date/Time: Before Judge:	If Summons, complete following:	Where defendant previously apprehended on complaint no new summons or
Date/Time: Before Judge:		
		Date/Time: Before Judge:
	Comments:	

PENALTY SHEET - STERLING WALKER

Count One:

18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States Maximum Penalties: 5 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Count Two: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base and 500 grams or more of cocaine powder

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

Count Five: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in firearms without a license

Maximum Penalties: 5 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Count Twenty-Three: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B) -- Conspiracy to manufacture, distribute, or possess with intent to distribute controlled substances, to wit 28 grams or more of cocaine base

Maximum Penalties: 5-40 years imprisonment; 4 years –lifetime of supervised release, \$5 million criminal fine; \$100 special assessment; forfeiture, denial of federal benefits.

DEFENDANT INFORMATION RELATIVE T	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDII	NORTHERN DISTRICT OF CALIFORNIA
18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the Petty	OAKLAND DIVISION
United States; 18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License Mino	DEFENDANT - U.S
Misc	
Felg	nv 7
PENALTY: See attached	DO DISTRICT COURT NUMBER 043 YOU
IAM O A	OIL I O I OIL
JAN 24	ZU 19 DEFENDANT — DEFENDANT —
PROCEEDING CLERK, U.S. DISTR	CONCO I
NORTHERN DISTRICT	OF CALIFORNIA Has not been arrested, pending outcome this proceeding.
Name of Complaintant Agency, or Person (& Title, if any)	1) X If not detained give date any prior summons was served on above charges
ATF	-
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district	
per (circle one) FRCrp 20, 21, or 40. Show District	IO IN QUOTABY
	IS IN CUSTODY
this is a reprosecution of	4) On this charge
charges previously dismissed	5) On another conviction
which were dismissed on motion SHOW of: SHOW	
U.S. ATTORNEY DEFENSE	6) Awaiting trial on other charges
	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes If "Yes"
pending case involving this same defendant MAGISTRATE	I I I I I I I I I I I I I I I I I I I
CASE NO. prior proceedings or appearance(s)	DATE OF Month/Day/Year
before U.S. Magistrate regarding this	ARREST 7
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form David Anderson	DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year
✓ U.S. Attorney ☐ Other U.S. Agency	
Name of Assistant U.S.	This report amends AO 257 previously submitted
Attorney (if assigned) Shiao Lee & Frank Riebli	
PROCESS: ADDITIONAL INF	ORMATION OR COMMENTS —
SUMMONS NO PROCESS* WARRANT	Bail Amount: No Bail
If Summons, complete following:	
Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	
· · · · · · · · · · · · · · · · · · ·	Date/Time: Before Judge:
Comments:	

PENALTY SHEET - DESHAWN LEMONS-WOODARD

Count One:

18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States

Maximum Penalties: 5 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Count Four: 18 U.S.C. § 922(a)(1)(A) -- Unlawfully engaging in the business of dealing in firearms without a license

Maximum Penalties: 5 years imprisonment; 3 years of supervised release; \$250,000 fine; \$100 special assessment; forfeiture.

Control of the Contro	
DEFENDANT INFORMATION RELATIVE	/E TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION INDICT	MENT Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPER	
18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;	Petty OAKLAND DIVISION
18 U.S.C. § 922(o) – Possession of a Machine Gun	Minor C DEFENDANT - U.S
	Misde-
	meanor VERNELL THROWER Felony
PENALTY: See attached	DISTRICT COURT NUMBER
	FILED CD 10 049
	01 3 043
	JAN 2 4 2019 DEFENDANT
PROCEEDING Name of Complaintant Agency or Person (8 Title if any)	SUSANY BOONGS NOT IN CUSTODY SUSANY BOONGS NOT IN CUSTODY
Name of Complaintant Agency, of Person (& Title, If any)	SUSANY, BOCNES NOT IN CUSTODY SUSANY, BOCNES NOT IN CUSTODY CLERK, U.S. DISTRICT OF DESCRIPTION OF SUMMONS Was served on above charges
ATF person is awaiting trial in another Federal or State Cou	
give name of court	ırt, 2) 🗌 Is a Fugitive
	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another dist	rict
per (circle one) FRCrp 20, 21, or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of charges previously dismissed	5) 🗔 🔾
which were dismissed on motion SHO	r i i euciai i i State
of: U.S. ATTORNEY DEFENSE	6) Awaiting trial on other charges
G.S. ATTORNET	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes If "Yes"
pending case involving this same defendant MAGIST	RATE been filed? No give date filed
CASE prior proceedings or appearance(s)	NO. DATE OF Month/Day/Year
before U.S. Magistrate regarding this defendant were recorded under	ARREST 7
	Or if Arresting Agency & Warrant were not DATE TRANSFERRED Month/Day/Year
Name and Office of Person Furnishing Information on this form David Anderson	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
☑ U.S. Attorney ☐ Other U.S. Ag	ency
Name of Assistant U.S. Attorney (if assigned) Shiao Lee & Frank Riebli	This report amends AO 257 previously submitted
ADDITIONAL	INFORMATION OR COMMENTS
PROCESS:	
SUMMONS NO PROCESS* WARRAN	T Bail Amount: No Bail
If Summons, complete following: Arraignment Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment
Defendant Address:	warrant needed, since magistrate has scheduled arraignment
	Date/Time: Before Judge:
Comments:	

PENALTY SHEET - VERNELL THROWER

Count Seven: 18 U.S.C. § 922(o) - Possession of a Machine Gun

Maximum Penalties: 10 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

Count Eight: 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm

Maximum Penalties: 10 years imprisonment; 3 years of supervised release;

\$250,000 fine; \$100 special assessment; forfeiture.

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YGR

United States District Court

FOR THE NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

FILED

JAN 24 2019

SUSAN Y, SOONG CLERK, U.S. DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

 δN

UNITED STATES OF AMERICA.

V.

DANIEL JAMES, GEORGE MOORE, JR., TERRY WALKER SR., DALE DAVIS, PAUL RIVERA, DARRYL WASHINGTON, CAMERON MOORE-WILLIAMS, DEANTAE KENNEDY-PALMER, DARRELL MURPHY JR., STERLING WALKER, DESHAWN LEMONS-WOODARD, and VERNELL THROWER,

DEFENDANT(S).

INDICTMENT

VIOLATIONS:

18 U.S.C. § 371 – Conspiracy to Commit Offenses Against the United States;

18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License;

18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm;

18 U.S.C. § 922(o) – Possession of a Machine Gun;

18 U.S.C. § 922(k) – Possession of a Firearm With an Obliterated Serial Number;
21 U.S.C. § 846 – Conspiracy to Distribute and Possess with Intent to Distribute Cocaine and Cocaine Base;
21 U.S.C. § 841(a) – Distribution and Possession with Intent to Distribute Cocaine and Cocaine Base; and
18 U.S.C. § 924(d) and 21 U.S.C. § 853(a) – Forfeiture Allegations

Foreman

Filed in open court this 34th day of Stephen Ybnra

Clerk

Bail, \$

DAVID L. ANDERSON (CABN 149604) 1 United States Attorney 2 3 FILED 4 JAN 24 2019 5 SUSAN Y. SOONG CLERK, U.S. DISTRICT COURT 6 NORTHERN DISTRICT OF CALIFORNIA 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 OAKLAND DIVISION 043 UNITED STATES OF AMERICA, 11 Plaintiff, 12 **VIOLATIONS:** 18 U.S.C. § 371 – Conspiracy to Commit Offenses 13 V. Against the United States; 18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without DANIEL JAMES, GEORGE MOORE, JR., a License; 15 TERRY WALKER SR., 18 U.S.C. § 922(g)(1) – Felon in Possession of a DALE DAVIS, Firearm; PAUL RIVERA. 18 U.S.C. § 922(o) – Possession of a Machine Gun; 16 18 U.S.C. § 922(k) – Possession of a Firearm With an DARRYL WASHINGTON, Obliterated Serial Number: 17 CAMERON MOORE-WILLIAMS, DEANTAE KENNEDY-PALMER, 21 U.S.C. § 846 – Conspiracy to Distribute and DARRELL MURPHY JR., Possess with Intent to Distribute Cocaine and Cocaine 18 Base: STERLING WALKER, DESHAWN LEMONS-WOODARD, and 19 21 U.S.C. § 841(a) – Distribution and Possession with VERNELL THROWER, Intent to Distribute Cocaine and Cocaine Base; and 18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 20 Defendants. U.S.C. § 2461(c) – Forfeiture Allegations 21 OAKLAND VENUE 22 23 INDICTMENT 24 The Grand Jury charges: 25 COUNT ONE: (18 U.S.C. § 371 – Conspiracy to Commit an Offense Against the United States) 26 1. Beginning on a date unknown to the Grand Jury but since at least June 6, 2017, and 27 continuing up through and including January 10, 2019, in the Northern District of California, the Document No. 28 defendants.

INDICTMENT

District Court

Criminal Case Processing

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DANIEL JAMES. STERLING WALKER. DARRELL MURPHY JR. and DESHAWN LEMONS-WOODARD,

knowingly and willfully conspired and agreed with each other and with others, known and unknown to the Grand Jury, to commit offenses against the United States, namely, to willfully engage in the business of dealing in firearms without a license in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. The object of this conspiracy was to sell firearms to individuals. The means and methods by which the defendants and other members and associates of the conspiracy participated in the conspiracy included, but were not limited to, the following: DANIEL JAMES controlled the firearm sales that took place on Makin Road in Oakland, California; DANIEL JAMES and his co-conspirators collected firearms from other persons; and DANIEL JAMES either sold the firearms he and his coconspirators collected, or he facilitated, directed, or allowed his co-conspirators working on Makin Road to sell the firearms.

OVERT ACTS

3. In furtherance of the conspiracy and to effectuate the objects of the conspiracy, the coconspirators sold the following firearms in the Northern District of California, on or about the dates listed below, and each of these sales was an overt act in furtherance of the conspiracy:

Date	Firearm Sold	Seller
6/6/17	TKS Engineering AR15HD .223 cal. rifle, serial no. 0910010	JAMES, LEMONS- WOODARD
6/13/17	Glock 23 40 cal. pistol with obliterated serial number	LEMONS- WOODARD
7/18/17	Glock 19 9mm pistol, serial no. TC928	LEMONS- WOODARD
7/18/17	Beretta 84FS Cheetah .380 cal. pistol, serial no. H07025Y	LEMONS- WOODARD
9/13/17	Smith & Wesson SD .40 cal. pistol, serial no. HFJ0152	JAMES
9/18/17	Springfield Armory XD .40 caliber pistol, serial no. US4275	JAMES
10/11/17	AR-15 style pistol, no manufacturer marks or serial number	JAMES

10/24/17	Beretta 96 .40 cal. pistol, serial no. BER080602	JAMES
10/24/17	AR-15 style pistol, no manufacturer marks or serial number	JAMES
11/21/17	Fully automatic Glock 22 40 cal. pistol, serial no. PZL229	JAMES
11/21/17	AR-15 style pistol, no manufacturer marks or serial number	JAMES, STERLING
1/31/18	Springfield Armory XD .45 caliber pistol, serial no. XD639243	JAMES
3/8/18	Springfield Armory XD .40 cal. pistol, serial no. XD565385	MURPHY
6/5/18	Springfield Armory XD .45 cal. pistol, serial no. XD667617	JAMES
6/5/18	AR-15 style pistol, no manufacturer marks or serial number	JAMES, STERLING
6/18/18	Kahr Arms P40 .40 cal. pistol, with an obliterated serial number	MURPHY
6/18/18	Smith & Wesson 9mm pistol, serial no. FWS8802	JAMES
7/12/18	Heckler & Koch USP40 .40 cal. pistol, serial no. 22-27117;	JAMES
7/12/18	Beretta 92FS 9mm pistol, serial no. E38985Z	JAMES
7/12/18	Smith & Wesson SD40 VE .40 cal. pistol, serial no. HFW2363	JAMES
7/12/18	Taurus PT99AF 9mm pistol, serial no. TYK51102	JAMES
7/31/18	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial no.	JAMES
7/31/18	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial no.	JAMES
8/23/18	Springfield Armory XD40 sub-compact .40 cal. pistol, serial no. US450601	MURPHY
8/23/18	Springfield Armory XD40 .40 cal. pistol, serial no. US387906	MURPHY
8/23/18	Smith & Wesson M&P .38 cal. pistol, serial no. 9076	MURPHY
8/23/18	Unknown mfr, serial no. unknown	MURPHY
10/9/18	Glock 30 .45 cal. pistol, serial no. CMT960US	JAMES
10/9/18	Glock-type .40 cal. sub-compact pistol, equipped with Glock 27 slide assembly, serial no. FFF989	JAMES
10/9/18	Bryco Arms Jennings Nine 9mm pistol, serial no. 1563705	JAMES
11/25/18	Unknown manufacturer, AK-Type short barreled rifle	JAMES
11/25/18	Kimber 1911 Ultra Carry II .45 cal. pistol, serial no. KU234373	JAMES

Additional overt acts, among others, were committed in the Northern District of California:

On or about June 6, 2017, DESHAWN LEMONS-WOODARD arranged the sale a) of a rifle and ammunition for DANIEL JAMES. DANIEL JAMES then sold the rifle and ammunition. DESHAWN LEMONS-WOODARD sold additional firearms in furtherance of the conspiracy on or about June 13 and July 18, 2017;

COUNT TWO:

(21 U.S.C. § 846 – Conspiracy to Possess with Intent to Distribute and to Distribute Cocaine and Cocaine Base)

4. Beginning on a date unknown to the Grand Jury but since at least October 11, 2017, and continuing up through and including January 10, 2019, in the Northern District of California, the defendants.

DANIEL JAMES,
GEORGE MOORE JR.,
TERRY WALKER SR.,
DALE DAVIS,
PAUL RIVERA,
DARRYL WASHINGTON,
CAMERON MOORE-WILLIAMS,
STERLING WALKER and
DEANTAE KENNEDY-PALMER,

and others known and unknown to the Grand Jury, knowingly and intentionally conspired to manufacture, distribute, and possess with intent to distribute a mixture and substance containing cocaine base, and conspired to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

Quantity of Cocaine and Cocaine Base Involved in the Conspiracy

- 5. With respect to DANIEL JAMES, GEORGE MOORE JR., TERRY WALKER SR., DALE DAVIS, PAUL RIVERA, and DARRYL WASHINGTON, their conduct as members of the conspiracy charged in Count Two, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count Two, involved 280 grams or more of a mixture and substance containing cocaine base, in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A), and 500 grams or more of a mixture and substance containing a detectable amount of cocaine, its sales, optical and geometric isomers, and salts of its isomers, in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B).
- 6. With respect to CAMERON MOORE-WILLIAMS, STERLING WALKER, and DEANTAE KENNEDY-PALMER, their conduct as members of the conspiracy charged in Count Two, which includes the reasonably foreseeable conduct of other members of the conspiracy charged in Count Two, involved 28 grams or more of a mixture and substance containing cocaine base, in violation of 21

1	
1	U.S.C. §§ 846, 841(a)(1) and (b)(1)(B), and 500 grams or more of a mixture and substance containing a
2	detectable amount of cocaine, its sales, optical and geometric isomers, and salts of its isomers, in
3	violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B).
4	
5	COUNT THREE: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)
6	7. Beginning on or about June 6, 2017 and continuing through January 10, 2019, in the
7	Northern District of California, the defendant,
8	DANIEL JAMES,
9	not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
10	willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
11	Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).
12	
13	COUNT FOUR: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)
14	8. Beginning on or about June 6, 2017 and continuing through January 10, 2019, in the
15	Northern District of California, the defendant,
16	DESHAWN LEMONS-WOODARD,
17	not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
18	willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
19	Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).
20	
21	<u>COUNT FIVE</u> : (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)
22	9. Beginning on or about November 21, 2017 and continuing through January 10, 2019, in
23	the Northern District of California, the defendant,
24	STERLING WALKER,
25	not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
26	willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
27	Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).
20	

1	COUNT SIX: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License)
2	10. Beginning on or about March 3, 2018 and continuing through January 10, 2019, in the
3	Northern District of California, the defendant,
4	DARRELL MURPHY JR.,
5	not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
6	willfully engaged in the business of dealing in firearms, in violation of Title 18, United States Code,
7	Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).
8	
9	COUNT SEVEN: (18 U.S.C. § 922(o) – Unlawful Possession and Transfer of a Machine Gun)
10	11. On or about November 2, 2017, in the Northern District of California, the defendants,
11	DARRYL WASHINGTON and VERNELL THROWER,
12	VERGODED TITICO WERK,
13	unlawfully possessed and transferred a machinegun (any weapon which shoots and is designed to shoot
14	automatically more than one shot, without manual reloading, by a single function of the trigger),
15	specifically, a Glock 23 .40 caliber pistol, serial number BAEA916, in violation of Title 18, United
16	States Code, Section 922(o).
17	
18	COUNT EIGHT: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)
19	12. On or about November 2, 2017, in the Northern District of California, the defendants,
20	DARRYL WASHINGTON and VERNELL THROWER,
21	, 224.222.333
22	having previously been convicted of a crime punishable by a term of imprisonment exceeding one year,
23	unlawfully and knowingly possessed a firearm, specifically, a Glock 23 .40 caliber pistol, serial number
24	BAEA916, in and affecting interstate commerce, in violation of Title 18, United States Code, Section
25	922(g)(1).
26	
27	<u>COUNT NINE</u> : (18 U.S.C. § 922(o) – Unlawful Possession and Transfer of a Machine Gun)
28	13. On or about November 21, 2017, in the Northern District of California, the defendant,
	INDICTMENT 7
- 1	

1	DANIEL JAMES,	
2	unlawfully possessed and transferred a machinegun (any weapon which shoots and is designed to shoot	
3	automatically more than one shot, without manual reloading, by a single function of the trigger),	
4	specifically, a Glock 22 .40 caliber pistol, serial number PZL229, in violation of Title 18, United States	
5	Code, Section 922(o).	
6		
7	COUNT TEN: (18 U.S.C. § 922(k) – Possession of Firearms with an Obliterated Serial Number)	
8	14. On or about July 31, 2018, in the Northern District of California, the defendant,	
9	DANIEL JAMES,	
10	knowingly possessed two firearms, specifically, two Anderson Manufacturing AM-15 5.56mm cal.	
11	pistols, that had been shipped and transported in interstate commerce, from which the manufacturer's	
12	serial number had been removed, altered, and obliterated, in violation of Title 18, United States Code,	
13	Sections 922(k) and 924(a)(1)(B).	
14		
15	COUNT ELEVEN: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)	
16	15. On or about July 31, 2018, in the Northern District of California, the defendant,	
17	PAUL RIVERA,	
18	having previously been convicted of a crime punishable by a term of imprisonment exceeding one year,	
19	unlawfully and knowingly possessed a firearm, specifically, a Taurus PT709 Slim 9mm caliber pistol,	
20	serial number THW16062, in and affecting interstate commerce, in violation of Title 18, United States	
21	Code, Section 922(g)(1).	
22		
23	COUNT TWELVE: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)	
24	16. On or about October 9, 2018, in the Northern District of California, the defendant,	
25	DARRYL WASHINGTON,	
26	having previously been convicted of a crime punishable by a term of imprisonment exceeding one year,	
27	unlawfully and knowingly possessed a firearm, specifically, a Bryco Arms Jennings 9mm pistol, serial	
28	number 1563705, in and affecting interstate commerce, in violation of Title 18, United States Code,	
	INDICTMENT 8	

1	Section 922(g)(1).
2	
3	COUNT THIRTEEN: (18 U.S.C. § 922(o) – Possession of a Machine Gun)
4	17. On or about January 10, 2019, in the Northern District of California, the defendant,
5	PAUL RIVERA,
6	unlawfully possessed and transferred a machinegun (any part designed and intended solely and
7	exclusively for use in converting a weapon into a weapon that shoots and is designed to shoot
8	automatically more than one shot, without manual reloading, by a single function of the trigger),
9	specifically, a device commonly known as a "Glock switch," in violation of Title 18, United States
10	Code, Section 922(o).
11	
12	COUNT FOURTEEN: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)
13	18. On or about January 10, 2019, in the Northern District of California, the defendant,
14	GEORGE MOORE JR.,
15	having previously been convicted of a crime punishable by a term of imprisonment exceeding one year
16	unlawfully and knowingly possessed a firearm, specifically, a Mossberg 500A shotgun, serial number
17	K888504, in and affecting interstate commerce, in violation of Title 18, United States Code, Section
18	922(g)(1).
19	
20	COUNT FIFTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine Base)
21	19. On or about January 29, 2018, in the Northern District of California, the defendant,
22	19. On or about January 29, 2018, in the Northern District of Camorina, the defendant,
23	DANIEL JAMES,
24	knowingly and intentionally distributed and possessed with intent to distribute 28 grams or more of a
25	mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United
26	States Code, Sections 846, 841(a)(1) and 841(b)(1)(B)(iii).
27	
28	
- 1	

1 2	COUNT SIXTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine)
3	20. On or about March 15, 2018, in the Northern District of California, the defendant,
4	DANIEL JAMES,
5	knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
6	containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers
7	in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).
8	
9 10	COUNT SEVENTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine Base)
11	21. On or about October 7, 2018, in the Northern District of California, the defendant,
12	DEANTAE KENNEDY-PALMER,
13	knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
14	containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections
15	846, 841(a)(1) and 841(b)(1)(C).
16	
17 18	COUNT EIGHTEEN: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine Base)
19	22. On or about October 9, 2018, in the Northern District of California, the defendant,
20	DANIEL JAMES,
21	knowingly and intentionally distributed and possessed with intent to distribute 28 grams or more of a
22	mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United
23	States Code, Sections 846, 841(a)(1) and 841(b)(1)(B)(iii).
24	
25 26	<u>COUNT NINETEEN</u> : (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine)
27	23. On or about October 11, 2018, in the Northern District of California, the defendant,
28	DANIEL JAMES,

1	knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
2	containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers
3	in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).
4	
5	COUNT TWENTY: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to
6	Distribute Cocaine Base)
7	24. On or about December 12, 2019, in the Northern District of California, the defendants,
8	DANIEL JAMES and PAUL RIVERA,
9	TAUL RIVERA,
10	knowingly and intentionally distributed and possessed with intent to distribute a mixture or substance
11	containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections
12	841(a)(1) and 841(b)(1)(C).
13	
14	<u>COUNT TWENTY-ONE</u> : (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine Base)
15	Bistribute Cocume Buse)
16	25. On or about January 10, 2019, in the Northern District of California, the defendant,
17	DANIEL JAMES,
8	knowingly and intentionally possessed with intent to distribute a mixture or substance containing a
9	detectable amount of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) and
20	841(b)(1)(C).
21	
22	COUNT TWENTY-TWO: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to Distribute Cocaine Base)
23	Bistitude Column Base)
24	26. On or about January 10, 2019, in the Northern District of California, the defendant,
25	TERRY WALKER SR.,
26	knowingly and intentionally possessed with intent to distribute a mixture or substance containing
27	cocaine base, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C).
28	
1.1	

1	COUNT TWENTY-THREE: (21 U.S.C. § 841(a)(1) – Distribution and Possession with Intent to		
2	Distribute Cocaine Base)		
3	27. On or about January 10, 2019, in the Northern District of California, the defendant,		
4	STERLING WALKER,		
5	knowingly and intentionally distributed and possessed with intent to distribute 28 grams or more of a		
6	mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United		
7	States Code, Sections 846, 841(a)(1) and 841(b)(1)(B)(iii).		
8			
9	<u>FORFEITURE ALLEGATION</u> : (18 U.S.C. § 924, 21 U.S.C. § 853, and 28 U.S.C. § 2461(c) –		
10	Criminal Forfeiture)		
11	1. The allegations contained above in this Indictment are realleged and by this reference		
12	fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C		
13	§ 924 and 21 U.S.C. § 853.		
14	2. Upon a conviction of any of the offenses alleged in Counts One and Three through		
15	Fourteen above, the defendants,		
16	DANIEL JAMES,		
17	PAUL RIVERA, DARRYL WASHINGTON,		
18	STERLING WALKER, DARRELL MURPHY JR.,		
19	DESHAWN LEMONS-WOODARD, GEORGE MOORE JR. and		
20	VERNELL THROWER,		
21	shall forfeit to the United States pursuant to 18 U.S.C. § 924(d)(1), any firearms and ammunition		
22	involved in the commission of the offenses, including but not limited to the following property:		
23			
24	TKS Engineering AR15HD .223 cal. rifle, serial no. 0910010		
25	Glock 23 40 cal. pistol with obliterated serial number		
26	Glock 19 9mm pistol, serial no. TC928		
	Beretta 84FS Cheetah .380 cal. pistol, serial no. H07025Y		
27	Smith & Wesson SD .40 cal. pistol, serial no. HFJ0152		
28	Springfield Armory VD, 40 caliber pictal, carial no. US4275		

1	AR-15 style pistol, no manufacturer marks or serial number	
2	Beretta 96 .40 cal. pistol, serial no. BER080602	
3	AR-15 style pistol, no manufacturer marks or serial number	
	Fully automatic Glock 23 .40 cal. pistol, serial no. BAEA916	
4	Fully automatic Glock 22 40 cal. pistol, serial no. PZL229	
5	AR-15 style pistol, no manufacturer marks or serial number	
6	Springfield Armory XD .45 caliber pistol, serial no. XD6392	43
	Springfield Armory XD .40 cal. pistol, serial no. XD565385	
7	Springfield Armory XD .45 cal. pistol, serial no. XD667617	
8	AR-15 style pistol, no manufacturer marks or serial number	137
9	Short-barreled rifle, no manufacturer marks or serial number	
10	Kahr Arms P40 .40 cal. pistol, with an obliterated serial num	ber
000,0000	Smith & Wesson 9mm pistol, serial no. FWS8802	
11	Heckler & Koch USP40 .40 cal. pistol, serial no. 22-27117;	
12	Beretta 92FS 9mm pistol, serial no. E38985Z	
13	Smith & Wesson SD40 VE .40 cal. pistol, serial no. HFW236	53
50.794.54.5	Taurus PT99AF 9mm pistol, serial no. TYK51102	
14	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial n	10.
15	Anderson Mfg AM-15 5.56mm cal. pistol, obliterated serial no.	
16	Taurus PT709 Slim 9mm cal. pistol	
17	Springfield Armory XD40 sub-compact .40 cal. pistol, serial	no. US450601
	Springfield Armory XD40 .40 cal. pistol, serial no. US38790	6
18	Smith & Wesson M&P .38 cal. pistol, serial no. 9076	
19	Unknown mfr, serial no. unknown	
20	Glock 30 .45 cal. pistol, serial no. CMT960US	
21	Glock-type .40 cal. sub-compact pistol, equipped with Glock assembly, serial no. FFF989	27 slide
22	Bryco Arms Jennings Nine 9mm pistol, serial no. 1563705	
	Unknown manufacturer, AK-Type short barreled rifle	
23	Kimber 1911 Ultra Carry II .45 cal. pistol, serial no. KU2343	73
24	Unknown make/model pistol with an "auto switch," seized on 2019	January 10,
25	Unknown make/model pistol, serial no. PF940C, seized on Ja	nuary 10, 2019
26	Glock 30S, .45 caliber pistol, serial no. YEP619, seized on January	nuary 10, 2019
27	Glock .45 caliber pistol with extended magazine, seized on Ja	nuary 10, 2019
28	Davis Industries P380 pistol, serial no. AP068569, seized on 2019	January 10,

Mossberg 500A shotgun, serial no. K888504, seized on January 10, 2019
Smith & Wesson 9mm handgun, serial no. FWF7388

3. Upon a conviction of any of the offenses alleged in Count Two and Counts Fifteen through Twenty-Three, the defendants,

DANIEL JAMES,
GEORGE MOORE JR.,
DALE DAVIS,
TERRY WALKER SR.,
PAUL RIVERA,
DARRYL WASHINGTON,
CAMERON MOORE-WILLIAMS,
STERLING WALKER and
DEANTAE KENNEDY-PALMER,

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), all right, title, and interest in property constituting and derived from any proceeds the defendants obtained, directly or indirectly, as a result of said violations, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the said violations. Property to be forfeited includes but is not limited to a forfeiture money judgment and all United States currency and electronic devices, including mobile telephones, seized on or about January 10, 2019.

- 4. If, as a result of any act or omission of the defendants, any of said property
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to or deposited with a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
- e. has been commingled with other property with cannot be divided without difficulty; the United States of America shall be entitled to forfeiture of substitute property of the defendants pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 924.

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1	All pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 83	53, 28 U.S.C. § 2461(c), and Federal Rule of
2	Criminal Procedure 32.2.	
3		
4	DATED: Jan. 24, 2019	A TRUE BILL.
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6		FOREPERSON
7		
8		
9	DAVID L. ANDERSON United States Attorney	
10		
11	STEPHANIE M. HINDS	
12	Deputy Chief, Criminal Division	
13		
14	(Approved as to form: Shiao Lee and Frank Riebli	
15	Assistant United States Attorneys	
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INDICTMENT

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